From:	Ann Burdett
To:	Roberts, Yvette
Subject:	RE: ANSWERS FOR YOUR CLIENT
Date:	Wednesday, November 21, 2018 12:48:49 PM
Attachments:	Screw Cap.jpg Nipple in 4 inch and 8 inch lengths.jpg

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Hi Yvette,

I received more clarification on the PVC (so I thought) sections used in containing the elemental mercury. See attached photos.

The containers for the mercury consist of Black Iron Malleable Caps and Black Steel Nipples. The threads of the pipe are taped with Teflon tape to ensure that they will not leak. I have attached pictures of the parts used for the containers also the caps on the containers have been securely tightened. If they are going to be opened they will have to be opened in a shop because the caps have been torqued down to approximately 100 LBS op pressure. These (one 4" long and one 8" long) were then placed in a cardboard box and then placed in the DOT white rigid plastic bucket with vermiculite.

As for the "Rigid" containers Wayne asked about below, it is a DOT approved white rigid plastic bucket with the screw top lid (2 separate used for lab packing both waste types: UW and elemental mercury).

Assuming we are OK with shipping as indicated. Not sure if I should have copied Wayne or not.

Thanks,
Ann

From: Roberts, Yvette [mailto:yvette.roberts@veolia.com]
Sent: Tuesday, November 20, 2018 2:32 PM
To: Ann Burdett <aburdett@csu.org>
Subject: Fwd: ANSWERS FOR YOUR CLIENT

[External Email - Be careful! DO NOT open attachments or click links from unknown senders or unexpected email.]

Hi.

Below were some helpful responses I received to answer your questions.

Thank you.

Regards,

Yvette Roberts
Customer Service Administrator

Industrial Business
VEOLIA NORTH AMERICA
tel

+1 602 233-6891
fax

+1 602 415 3030 / Toll Free 800/368-9095
5736 West Jefferson Street / Phoenix, AZ 85043

---------- Forwarded message ---------
From: **Bulsiewicz, Wayne** <wayne.bulsiewicz@veolia.com>
Date: Tue, Nov 20, 2018 at 2:13 PM
Subject: ANSWERS FOR YOUR CLIENT
To: Roberts, Yvette <yvette.roberts@veolia.com>

Spent Elemental Mercury (11 lbs total)

We have two PVC pipes (one 4" long and one approx. 8" long with sealed caps on each end) that contain spent elemental mercury. Are you OK with how this was packaged?

OKAY, BUT A NALGENE BOTTLE WOULD BE BETTER, WORRIED ABOUT THE CAPS COMING LOOSE.

Both PVC pipes were placed in one cardboard box and that cardboard box was placed in a DOT approved container with vermiculite (lab packed).

IS THAT CONTAINER A RIDGID CONTAINER SUCH AS A PLASTIC PAIL?

I have profiled it as hazardous waste under RQ, UN2809, Waste Mercury, 8(6.1), PG III (D009). Are you good with this? **YES**

I indicated Non-Wastewater with Sub Category >260 mg/kg total mercury (High Mercury-Organic Subcatergory) - Is this subcategory correct?

NO, IT IS INORGANIC NOT ORGANIC

If this subcategory is correct, then on the LDR it indicates I must complete the F039/UHC Form, do I just list D009 even though I will already list that under the LDR's EPA Waste Code section.

N/A

Universal Waste – Mercury contained in manufactured articles

We have managed these as UW in Colorado.

I have profiled these as RQ, UN3506, Waste Mercury Contained in Manufactured Articles, 8(6.1) (D009). Are you good with this?

YES DROP THE D009 SINCE IT IS NOT BEGIN SHIPPED AS HAZARDOUS WASTE, BUT UNIVERSAL WASTE ON A BOL.

They put all 4 thermostats (with intact Hg bulb inside plastic thermostat box) in a 1.25 gallon DOT approved container with vermiculite. Are you OK with the whole thermostat structure or should the Hg bulbs be removed and placed in container without the plastic housing?

OKAY AS IT IS.

--

Wayne Bulsiewicz
Environmental Health and Safety Manager
Industrial Business
VEOLIA NORTH AMERICA

tel

+1 602 233 2955
/ cell

+1 602 725 7726 /
fax

+1 602 415 3030
5736 W Jefferson Street / Phoenix, AZ 85043
wayne.bulsiewicz@veolia.com
www.veolianorthamerica.com

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